

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE VANGUARD CHESTER FUNDS
LITIGATION

Case No. 2:22-cv-955-JFM

**JOINT STIPULATION AND [PROPOSED] ORDER
REGARDING SETTLEMENT**

Plaintiffs Haifan Liang, Julia Lucas, Donald R. Lichtenstein, Samuel B. Skraly, Ardes Poisson, Valerie M. Verduce, John Harvey, Caitlin Brigham, Jeffrey Chaussee, Zeb Bradford, Benjamin Deming, and James Daily (collectively, “Plaintiffs”) and Defendants The Vanguard Group, Inc., Vanguard Chester Funds, Mortimer J. Buckley, John Bendl, Christine M. Buchanan, John E. Schadl, Emerson U. Fullwood, Amy Gutmann, F. Joseph Loughrey, Mark Loughridge, Scott C. Malpass, Deanna Mulligan, André F. Perold, Sarah Bloom Raskin, and Peter F. Volanakis (collectively, “Defendants,” and together with Plaintiffs, the “Parties”), by and through their respective undersigned counsel, hereby notify the Court of their agreement in principle to resolve all claims in this Action, and accordingly stipulate and agree as follows:

WHEREAS, the Parties participated in a private mediation with the Hon. Layn Phillips on July 31, 2025;

WHEREAS, the mediation was successful and the Parties reached an agreement in principle to fully resolve all claims in this Action;

WHEREAS, the Parties require time to negotiate and memorialize the attendant details of the settlement;

WHEREAS, Plaintiffs intend to move for preliminary approval of the proposed class settlement within 45 days;

WHEREAS, the Court's Order dated June 6, 2025 (Dkt. No. 194) stayed all outstanding deadlines in this Action through Thursday, August 7, 2025, and set further deadlines upon expiration of the stay;

WHEREAS, the Parties wish for their litigation positions to remain undisturbed while they negotiate and finalize their settlement agreement, and to preserve the Court's and the Parties' resources;

NOW, THEREFORE, the Parties, through their undersigned counsel, hereby agree, stipulate, and respectfully request that the Court enter an Order as follows:

1. All outstanding deadlines in this Action are hereby stayed pending the Parties' formal agreement to, and the Court's approval of, the proposed settlement.
2. If Plaintiffs have not filed a motion for preliminary approval of the proposed settlement by September 22, 2025, the Parties will file a joint status report on or by that date.

Respectfully submitted,

Dated: August 7, 2025

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Dated: August 7, 2025

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IT IS SO ORDERED this ____ day of _____, 2025.

HONORABLE JOHN F. MURPHY
UNITED STATES DISTRICT JUDGE